

Remarks

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 1-35 are pending in the application, with claims 1, 8, 10, 16, 17, 18, 26, and 32 being the independent claims. Claim 17 is sought to be amended to correct typographical errors. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

Rejections under 35 U.S.C. § 102

In the Office Action, the Examiner rejects claims 1-15, 18-21, and 24-31 under 35 U.S.C. § 102(e), as allegedly being anticipated by U.S. Patent No. 6,198,906 to Boetje *et al.* (herein referred to as "Boetje"). Paper No. 17, page 2. Applicants respectfully traverse.

Referring to the independent claims (namely, claims 1, 8, 10, 18, and 26), Boetje does not describe a method or system for:

...creating (or enabling creation of) an instruction sequence for [a] show, wherein said instruction sequence defines one or more sets of production commands, said one or more sets comprising one or more segment files, each of said segment files comprising a group of production commands that, when executed, operates to ***produce a segment of the show***, each segment file comprising ***scripted portions that include commands activated in relation to a script*** and non-scripted portions that include commands activated independent of a script, each segment having a duration which is defined by execution of said instruction sequence under the control of a human operator.

Although the Examiner has cited Boetje for teaching “a computer implemented method and corresponding apparatus for producing a show” (see Paper No. 17, page 2), Boetje, nonetheless, does not teach a “production system.” On the contrary, Boetje describes a “method and apparatus for performing **broadcast** operations that enables [sic] a programmer to **schedule broadcast** constituents (Abstract).” The method and system described in Boetje enables the “scheduling” and the “broadcasting” of content (i.e., “constituents”) that has already been “produced” from another source. For example, Col. 6, lines 1-8 describe the receipt of video input from a “satellite receiver” and/or “VTR” for “broadcast.” Col. 15, lines 45-46 describe “scheduling of a VTR to play a clip” (see also Col. 29, lines 29-37). Col. 23, lines 42-45 describe that “an automated ‘broadcast’ system...accesses the scheduling hierarchy to determine what to ‘play’ next.” In other words, Boetje describes a method and system for generating a “preferred composition [of content] to broadcast to air” (Col. 31, lines 48-59). Boetje does not describe the actual “production” of the content that is subsequently scheduled to generate the “preferred composition”.

Applicants’ invention, on the other hand, is directed to the “production and broadcasting of a show” (see, for example, Specification at page 71, lines 20-24 and page 72, lines 22-26). More specifically, as recited in the independent claims 1, 8, 10, 18, and 26, Applicants invention, inter alia, “operates to **produce a segment of a show**” by executing a segment file “comprising **scripted portions that include commands activated in relation to a script** and non-scripted portions that include commands activated independent of a script.” Boetje does not describe a “script” and hence, does

not describe “commands activated in relation to a script.” Referring to, for example, page 26, lines 5-26, Applicants’ Specification describes the execution of production commands to load, cue, play, pause, etc., a “script” from a teleprompting system. This feature is not disclosed in Boetje.

Therefore, Applicants respectfully submit that Boetje does not describe each and every element, limitation, and/or feature of claims 1, 8, 10, 18, and 26. Claims 2-7, 9, 11-15, and 27-31 depend from claims 1, 8, 10, 18, and 26, respectively, and are patentable over Boetje for at least the reasons stated above, in addition to the additional elements, limitations, and/or features recited therein. Accordingly, Applicants respectfully request reconsideration and withdrawal of the Examiner’s rejection of the aforesaid claims, and allowance thereof.

Rejections under 35 U.S.C. § 103

In the Office Action, the Examiner rejects claims 16, 17, 22, 23, and 32-35 under 35 U.S.C. § 103, as allegedly being obvious over Boetje. Paper No. 17, page 3.

Applicants respectfully traverse.

Referring to the independent claims (namely, claims 16, 17, and 32), Boetje does not describe a method or system for:

...enabling creation of an instruction sequence for [a] show, wherein said instruction sequence defines one or more sets of production commands, said one or more sets comprising one or more segment files, each of said segment files comprising a group of production commands that, when executed, operates to ***produce a segment of the show***, each segment file comprising ***scripted portions that include commands activated in relation to a script*** and non-scripted portions that include commands activated independent of a script, each segment

having a duration which is defined by execution of said instruction sequence under the control of a human operator.

The Examiner, once again, has cited Boetje for teaching “a computer implemented method and corresponding apparatus for producing a show” (see Paper No. 17, page 3). However, as discussed above (with reference to the rejections under 35 U.S.C. § 102(e)), Boetje does not teach or suggest the “production” of a show, and does not teach or suggest the execution of commands from a segment file “comprising *scripted portions that include commands activated in relation to a script*”. On the contrary, Boetje describes a system and method for scheduling and broadcasting content “post-production.” Although it discusses the “composition” of post-produced content, Boetje does not teach or suggest the “production” process (e.g., loading and playing a *script* from a teleprompting system).

Therefore, Applicants respectfully submit that Boetje does not describe each and every element, limitation, and/or feature of claims 16, 17, and 32. Claims 33-35 depend from claims 32, and are patentable over Boetje for at least the reasons stated above, in addition to the additional elements, limitations, and/or features recited therein. Accordingly, Applicants respectfully request reconsideration and withdrawal of the Examiner’s rejection of the aforesaid claims, and allowance thereof.

Conclusion

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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